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VIA ECF and Email: berNSTEIN.chambers@nysb.uscourts.gov

Hon. Stuart M. Bernstein, U.S.D.J.
United States Bankruptcy Court
Southern District of New York
One Bowling Green
New York, New York 10004-1408

Re: *Picard v. Kuntzman Family LLC, et al.,*
Adv. Pro. No. 10-04752 (SMB)

Dear Judge Bernstein:

I write to object to the form of order submitted by the Trustee's counsel with respect to this firm's withdrawal as counsel for Kuntzman Family LLC, the only defendant remaining in this case as a result of your June 2015 decision dismissing the subsequent transferee defendants. Since we are dealing with parties who are not represented by counsel, I think it is important not to make the order confusing to them. The inclusion of the dismissed defendants will undoubtedly cause confusion for Wayne Green and his wife. Since the Trustee's counsel readily acknowledged at the first argument on this motion that the only remaining defendant is the LLC, I fail to see the harm in including this language. There is definite harm if the language is not included. I enclose a form of the order with my proposed changes, both red-lined and final.

Respectfully submitted,

/s/ Helen Davis Chaitman

Helen Davis Chaitman

HDC:leb
Encl.

cc: *Via Email:*
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